

1 Richard Edward Haskin (Nevada Bar No. 11592)
Steven Mack (Nevada Bar No. 4000)
2 GIBBS GIDEN LOCHER TURNER & SENET
1140 N. Town Center Drive, Suite 300
3 Las Vegas, NV 89144
Telephone: (702) 836-9800

4 Nathan D. O'Malley (California Bar No. 212193 - *Pro Hac Vice*)
5 Daniel Taylor (California Bar No. 241404 - *Pro Hac Vice*)
Giorgio A. Sassine (California Bar No. 324639 - *Pro Hac Vice*)
6 MUSICK, PEELER & GARRETT LLP
624 South Grand Avenue, Suite 2000
7 Los Angeles, California 90017-3383
Telephone: (213) 629-7600
8 Facsimile: (213) 624-1376

9 Attorneys for PAYVISION B.V., a Netherlands limited liability company

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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

13 GAIA ETHNOBOTANICAL, LLC DBA
14 MITRAGAIA,

15 Plaintiff,

16 vs.

17 T1 PAYMENTS, LLC; PAYVISION
B.V.; and DOES 1-10 and ROE
18 Corporations 1-10,

19 Defendants.

Case No. 2:22-CV-01046-CDS-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE AND PAGE
LIMIT FOR PAYVISION B.V.'S
REPLY TO GAIA
ETHNOBOTANICAL, LLC DBA
MITRAGAIA'S OPPOSITION TO
MOTION TO DISMISS**

[SPECIAL APPEARANCE ONLY]

Judge: Cristina D. Silva

1 IT IS HEREBY STIPULATED AND AGREED, by and between all interested parties
 2 to this stipulation, Plaintiff GAIA ETHNOBOTANICAL, LLC DBA MITRAGAIA
 3 (“Gaia”), by and through its counsel, the law firms of Allen & Associates and The Law
 4 Offices of David Liebrader, and **BY SPECIAL APPEARANCE ONLY**, Defendant
 5 PAYVISION B.V. (“Payvision B.V.”), by and through its counsel, the law firms of Gibbs
 6 Giden Locher Turner Senet & Wittbrodt and Musick, Peeler & Garrett LLP (collectively,
 7 the “Parties”), stipulate and agree as follows:

8 1. On May 18, 2022, Gaia filed a civil action in the Eighth Judicial District Court
 9 in Clark County, Nevada.

10 2. On July 1, 2022, Defendant T1 Payments LLC (“T1”) filed a notice of removal
 11 to remove Gaia’s civil action to this Court. T1 attached Gaia’s First Amended Complaint
 12 (“FAC”) as Exhibit 1 to its notice of removal.

13 3. On September 6, 2022, Payvision B.V. filed a Motion to Dismiss the FAC.

14 4. On September 21, 2022, Gaia filed an Opposition to Payvision B.V.’s Motion
 15 to Dismiss the FAC.

16 5. The current deadline for Payvision B.V. to file a Reply to Gaia’s Opposition
 17 to Payvision B.V.’s Motion to Dismiss the FAC is September 28, 2022.

18 6. Given the extensive issues that Payvision B.V. needs to respond to in its Reply
 19 to Gaia’s Opposition to Payvision B.V.’s Motion to Dismiss the FAC, Payvision B.V.’s
 20 counsel met and conferred with Gaia’s counsel to stipulate and agree to an extension of time
 21 until October 5, 2022 to file its Reply to Gaia’s Opposition to Payvision B.V.’s Motion to
 22 Dismiss the FAC and to allow Payvision B.V. eight additional pages more than the limit of
 23 twelve pages set by Local Rule 7-3(b), excluding exhibits. Gaia’s counsel stipulated and
 24 agreed to the foregoing.

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7. The Parties submit that good cause exists to warrant the agreed to stipulation.

Respectfully submitted,

September 23, 2022

THE LAW OFFICES OF DAVID LIEBRADER

/s/ Adam Allen

By

David Liebrader, Esq. (State Bar No. 5048)
3960 Howard Hughes Parkway Ste 500
Las Vegas, Nv 89169

ALLEN & ASSOCIATES
Adam Allen, Esq. (Pro Hac Vice)
2929 Allen Parkway, #200
Houston, Texas 77019

*Attorneys for Plaintiff Gaia Ethnobotanical,
LLC*

MUSICK, PEELER & GARRETT LLP

By /s/ Giorgio A. Sassine

Nathan D. O'Malley (Pro Hac Vice)
Daniel Taylor (Pro Hac Vice)
Giorgio A. Sassine (Pro Hac Vice)
624 South Grand Avenue, Suite 2000
Los Angeles, California 90017-3383

GIBBS GIDEN LOCHER TURNER & SENET
Richard Edward Haskin (Nevada Bar No. 11592)
Steven Mack (Nevada Bar No. 4000)
1140 N. Town Center Drive, Suite 300
Las Vegas, NV 89144

*Attorneys for PAYVISION B.V., a Netherlands
limited liability company*

ORDER

Based on the foregoing,

IT IS HEREBY ORDERED, that Payvision B.V.’s Reply to Gaia’s Opposition to Payvision B.V.’s Motion to Dismiss Gaia’s First Amended Complaint shall be due on October 5, 2022.

1 **IT IS HEREBY ORDERED**, that Payvision B.V. Reply to Gaia's Opposition to
2 Payvision B.V.'s Motion to Dismiss Gaia's First Amended Complaint shall be limited to 20
3 pages, excluding exhibits.

4 IT IS SO ORDERED.

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6 DATED: September 26, 2022.



7 THE HONORABLE CRISTINA D. SILVA
8 UNITED STATES DISTRICT JUDGE
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